

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

JOSEPH LLOYD THOMPSON, et al.,

Petitioners/Plaintiffs,

v.

JOHN TSOUKARIS, et al.,

Respondents/Defendants.

Case No.: 20-cv-1449-SDG

**THE DOE PETITIONERS' MOTION FOR LEAVE TO  
PROCEED UNDER PSEUDONYMS AND FOR A PROTECTIVE ORDER**

Petitioners/Plaintiffs Jenner Benavides, David Fernandez, Sarai Hernandez, Tomas Hernandez, Gerardo Arriaga, Michael Robinson, Karen Lopez, and Peter Owusu (collectively, the “Doe Petitioners”), by and through undersigned counsel, respectfully seek leave to proceed under pseudonyms in this action to protect their identities from public disclosure. The Doe Petitioners also move the Court for a protective order requiring Respondents/Defendants to maintain the confidentiality of their identities by using only pseudonyms in all of their filings, including all exhibits in which the Doe Petitioners’ names appear. This motion is supported by a Memorandum of Law and the Declarations of each Doe Petitioner, filed as exhibits to Petitioners/Plaintiffs’ Petition for Writ of

Habeas Corpus Pursuant to 28 U.S.C. § 2241 and Complaint for Declaratory and Injunctive Relief, each of which are being filed contemporaneously herewith. The Doe Petitioners will promptly disclose their true identities to the Court following the filing of this action and this motion.

Each Doe Petitioner should be permitted to pursue this litigation under pseudonyms. As detailed in Plaintiffs' Memorandum of Law, because the Doe Petitioners faced persecution and violence in their home countries, they reasonably fear that they or their family members will be retaliated against, harassed, or even physically harmed if their identities and personal stories are disclosed publicly. In addition, proceeding pseudonymously is necessary to protect the Doe Petitioners' privacy rights because their physical and mental health conditions are a principal issue in this case. In contrast, because this action involves legal issues asserted against government parties, permitting the Doe Petitioners to proceed anonymously would not affect the public interest in open judicial proceedings and would not be prejudicial to Respondents/Defendants.

For these and other reasons, the Doe Petitioners respectfully request that the Court grant their motion to proceed under pseudonyms and enter a protective order requiring Respondents/Defendants to maintain the confidentiality of the Doe Petitioners' identities in all filings.

Dated: April 3, 2020

Respectfully submitted,

SOUTHERN POVERTY LAW CENTER

By: /s/ Gracie Willis  
Gracie Willis (GA Bar #851021)  
Rebecca Cassler (GA Bar #487886)  
Lorilei Williams\*  
150 E. Ponce de Leon Ave., Ste. 340  
Decatur, GA 30030  
*Tel:* (404) 521-6700  
*Fax:* (404) 221-5857  
[gracie.willis@splcenter.org](mailto:gracie.willis@splcenter.org)  
[rebecca.cassler@splcenter.org](mailto:rebecca.cassler@splcenter.org)

Paul Chavez\*  
Victoria Mesa-Estrada\*  
2 S. Biscayne Blvd., Ste. 3200  
Miami, FL 33101  
*Tel:* (786) 347-2056  
[paul.chavez@splcenter.org](mailto:paul.chavez@splcenter.org)  
[victoria.mesa@splcenter.org](mailto:victoria.mesa@splcenter.org)

Melissa Crow\*  
1101 17<sup>th</sup> Street, NW, Ste. 705  
Washington, DC 20036  
*Tel:* (202) 355-4471  
*Fax:* (404) 221-5857  
[melissa.crow@splcenter.org](mailto:melissa.crow@splcenter.org)

ASIAN AMERICANS ADVANCING JUSTICE-  
ATLANTA

By: /s/ Hillary Li  
Hillary Li (GA Bar #898375)  
Phi Nguyen (Ga Bar #578019)  
5680 Oakbrook Pkwy, Ste. 148  
Norcross, GA 30093  
*Tel:* (404) 585-8466  
*Fax:* (404) 890-5690  
[hli@advancingjustice-atlanta.org](mailto:hli@advancingjustice-atlanta.org)  
[pnguyen@advancingjustice-atlanta.org](mailto:pnguyen@advancingjustice-atlanta.org)

KILPATRICK TOWNSEND & STOCKTON  
LLP

By: /s/ Tamara Serwer Caldas  
Tamara Serwer Caldas (GA Bar #617053)  
Kathryn E. Isted (GA Bar #908030)  
Amanda Brouillette (GA Bar #880528)  
1100 Peachtree St., NE, Ste. 2800  
Atlanta, GA 30309  
*Tel:* (404) 815-6006  
*Fax:* (404) 541-4754  
[tcaldas@kilpatricktownsend.com](mailto:tcaldas@kilpatricktownsend.com)  
[kisted@kilpatricktownsend.com](mailto:kisted@kilpatricktownsend.com)  
[abrouillette@kilpatricktownsend.com](mailto:abrouillette@kilpatricktownsend.com)

*\*pro hac vice motions forthcoming*

**LOCAL RULE 7.1 CERTIFICATE OF COMPLIANCE**

I hereby certify that the foregoing pleading filed with the Clerk of Court has been prepared in 14 point Times New Roman font in accordance with Local Rule 5.1.

By: /s/ Hillary Li  
Hillary Li (GA Bar #898375)

Attorney for Petitioners/Plaintiffs

**CERTIFICATE OF SERVICE**

I hereby certify that on April 3, 2020, I have electronically filed the foregoing with the Clerk of the Court using the CM/ECF Systems. Given the emergency nature of this action, and the fact that no appearances have yet been entered by Defendants in this case, I further certify that on April 3, 2020, I emailed copies of the pleadings to Lori Beranek of the United States Attorneys' Office for the Northern District of Georgia, at [lori.beranek@usdoj.gov](mailto:lori.beranek@usdoj.gov).

*/s/ Amanda N. Brouillette*  
Amanda N. Brouillette